

May 21, 2025

VIA ECF AND E-MAIL

The Honorable Alvin K. Hellerstein  
United States District Judge  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 1050  
New York, NY 10007

*So ordered  
5.21.25  
Alvin K. Hellerstein*

Re: Kashef v. BNP Paribas S.A., No. 16 Civ. 3228 (AKH)

Dear Judge Hellerstein:

The parties jointly submit this letter seeking clarification of the Court's May 20, 2025 Order Regulating Proceedings (ECF 701) as it relates expert witnesses. In the Order, the Court directs the parties to "propose revised expert lists for trial, each side avoiding duplication," by June 9, and to file their oppositions to the other sides' experts by June 17. At the May 20 conference, however, the parties proposed, and the Court so ordered, the following schedule for submissions, which would enable the issues to be fully briefed in advance of the June 26 conference.

DATE	DESCRIPTION
May 30, 2025	Parties to exchange revised expert lists based on the Court's guidance to avoid duplication
June 9, 2025	Parties to file challenges to the other sides' experts
June 17, 2025	Parties to file responses to any challenges

See May 20, 2025 Hearing Tr. 88:4-25.

We respectfully request the Court reconfirm this schedule for submissions, which would allow the parties to respond to one another's challenges in advance of the June 26 conference and thus promote a more efficient resolution of the issues.

The Honorable Alvin K. Hellerstein  
U.S. District Court for the Southern District  
of New York

May 21, 2025  
Page 2

Respectfully submitted,

/s/ Kathryn Lee Boyd  
Kathryn Lee Boyd  
HECHT PARTNERS LLP  
125 Park Avenue, 25th Floor  
New York, New York 10017  
T: 646-502-9515  
lboyd@hechtpartners.com

/s/ Michael D. Hausfeld  
Michael D. Hausfeld  
HAUSFELD LLP  
888 16th Street, Suite 300  
Washington, D.C. 20006  
T: 202-540-7140  
mhausfeld@hausfeld.com

/s/ E. Danya Perry  
E. Danya Perry  
Joshua Perry  
E. DANYA PERRY PLLC  
445 Park Avenue, 7th Floor  
New York, New York 10022  
T: 212-840-7939  
dperry@danyaperrylaw.com

/s/ Cyril V. Smith  
Cyril V. Smith  
Aitan D. Goelman  
Joshua T. Mathew  
ZUCKERMAN SPAEDER LLP  
2100 L Street, NW, Suite 400  
Washington, D.C. 20037  
T: 410-949-1145  
csmith@zuckerman.com

*Attorneys for Plaintiffs*

/s/ Barry H. Berke  
Barry H. Berke  
Dani R. James  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, New York 10166  
T: 212-351-3860  
bberke@gibsondunn.com

/s/ Carmine D. Boccuzzi, Jr.  
Carmine D. Boccuzzi, Jr.  
CLEARY GOTTlieb STEEN & HAMILTON LLP  
One Liberty Plaza  
New York, New York 10006  
T: 212-225-2000  
cboccuzzi@cgsh.com

*Attorneys for BNP Paribas S.A. and  
BNP Paribas US Wholesale Holdings, Corp.*